SPIEGEL & MCDIARMID

GEORGE SPIEGEL (1919-1997)
ROBERT C. McDIARMID
ROBERT A. JABLON
JAMES N. HORWOOD
FRANCES E. FRANCIS
DANIEL I. DAVIDSON
THOMAS C. TRAUGER
JOHN J. CORBETT
CYNTHIA S. BOGORAD
SCOTT H. STRAUSS
BEN FINKELSTEIN
LISA G. DOWDEN
RISE J. PETERS
PETER J. HOPKINS
DAVID E. POMPER
WILLIAM S. HUANG

1333 NEW HAMPSHIRE AVENUE, NW WASHINGTON, DC 20036

WWW.SPIEGELMCD.COM

Telephone 202.879.4000 Facsimile 202.393.2866 E-mail INFO@SPIEGELMCD.COM

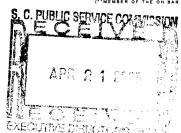
Direct Dial 202.879.4002 EMAIL JAMES.HORWOOD@SPIEGELMCD.COM ASSOCIATES
DAVID B. LIEB
PABLO O. NÜESCH
ANDREA G. LONIAN
LARISSA A. SHAMRAJ
STEPHEN C. PEARSON
SEAN M. FLYNN*
MELINDA CLAYBAUGH
WEMBER OF THE MD BAR ONLY)

OF COUNSEL

ALAN J. ROTH (1933-2003)
PAUL N. CONNOR**
MARK S. HEGEDUS
TILLMAN L. LAY
MARGARET A. MCGOLDRICK
MARGARET A. MEISER
JEFFREY A. SCHWARZ
BARRY M. SMOLER
SANDRA J. STREBEL
LEE C. WHITE

April 20, 2005

Mr. Charles Terreni Chief Clerk of the Commission SC Public Service Commission P.O. Drawer 11649 Columbia, SC 29211



Re: Annual Review of the Purchased Gas Adjustments & Purchasing

Policies for South Carolina Pipeline Corporation

Docket No. 2005-6-G

Dear Mr. Terreni:

Enclosed please find for filing an original and ten (10) copies of the Petition to Intervene of the Department of Public Utilities of the City of Orangeburg, South Carolina in the above-captioned matter. By copy of this letter, I am serving all parties of record listed in the Commission's website.

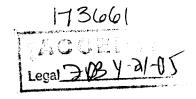
I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me in the enclosed stamped self-addressed envelope. If you have any questions, please feel free to contact me.

Very truly yours,

James N. Horwood

JNH:dmg Enclosures

cc: All parties of record (w/Encl.)



BEFORE THE PUBLIC SERVICE COMMISSION STATE OF SOUTH CAROLINA

INTERVENOR 7526/22/05/030

IN RE:

South Carolina Pipeline Corporation Annual Review of the Purchased Gas Adjustments and Gas Purchasing Policies Docket No. 2505-6-G

PETITION TO INTERVENE ON BEHALF OF THE CITY OF ORANGEBURG, SOUTH CAROLINA

Pursuant to the Public Service Commission ("Commission") Rule 103-836, the City of Orangeburg, South Carolina ("Orangeburg") hereby files this Petition to Intervene in this docket. In support of its petition, Orangeburg states as follows:

- 1. On October 5, 1987, the Commission issued an Order No. 87-1122 requiring an annual review of the Purchased Gas Adjustment and the Gas Purchasing Policies of South Carolina Pipeline Corporation ("SCPC").
- 2. The Commission has assigned Docket No. 2005-6-G to the referenced matter and has set a hearing for June 22, 2005.
- 3. Orangeburg is a political subdivision of the State of South Carolina that, among other things, is charged with purchasing natural gas for resale to its approximately 10,000 residential, commercial and industrial retail customers within and around the City of Orangeburg, and the towns of Cordova and Rowesville. Orangeburg provides retail gas service through its Department of Public Utilities ("DPU").
- 4. Orangeburg currently purchases a combination of transportation and bundled natural gas service from SCPC ("RFT Service").

DATE OF DRUKE

- 5. The matters before the Commission in this proceeding relate to issues directly affecting the City of Orangeburg, its citizens and inhabitants, and the retail gas customers of Orangeburg's Department of Public Utilities.
- 6. Given the state of the record at this stage in the proceeding, Orangeburg lacks sufficient information to fully develop and state its position in this proceeding at this time.
- 7. Granting Orangeburg's request to intervene in this proceeding is in the public interest, is consistent with the Commission's policy to encourage maximum public participation on issues before it, and should be allowed so that a full and complete record can be developed.
- 8. Orangeburg's authorized representatives for purposes of this docket, to whom communications regarding this matter may be made, are:

James N. Horwood, Esq.
Pablo O. Nüesch, Esq.
Spiegel & McDiarmid
1333 New Hampshire Avenue, N.W.
Washington, DC 20036
Telephone: (202) 879-4000

Mr. Fred Boatwright General Manager Department of Public Utilities City of Orangeburg P.O. Box 1057 Orangeburg, SC 29116 Telephone: (803) 268-4000

9. WHEREFORE, Orangeburg prays that it be allowed to intervene in this docket and all proceedings incident thereto, including the right to: appear as a party;

engage in discovery; make motions; participate in hearings by offering testimony and exhibits, and cross-examining witnesses; and receive service of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted,

James N. Horwood

Pablo O. Nüesch (S.C. Bar No. 13575)

Spiegel & McDiarmid

1333 New Hampshire Avenue, N.W.

Washington, DC 20036

Telephone: (202) 879-4000

Attorneys for the Department of Public Utilities of the City of Orangeburg, South Carolina

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing document to be served on the parties listed below by depositing a copy of same in the United States Mail, first class postage prepaid:

REPRESENTATIVE

ENTITY REPRESENTED

South Carolina Pipeline Corporation

K. Chad Burgess Willoughby & Hoefer, P.A. P.O. Box 8416 Columbia, SC 29202

C. Dukes Scott P.O. Box 11263 Columbia, SC 29211

Scott Elliott Elliott & Elliott, P.A. 721 Olive Street Columbia, SC 29205 Office of Regulatory Staff

South Carolina Energy Users Committee

Dated this 20th day of April, 2005, at Washington, D.C.

James N. Horwood